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May 1, 1997

Federal Communications Commission
Office of Secretary

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Common Carrier Bureau

Re: ATU Telecommunications
CC Docket 93-193 General Support Facilities

Dear Mr. Caton:

ATU Telecommunications ("ATU") hereby submits its response to the Memorandum Opinion and Order in CC Docket No. 93-193, released April 17, 1997.

ATU participates in the NECA Carrier Common Line Pool and filed its initial FCC Tariff No. 5 on April 2, 1993 pursuant to Section 61.38. ATU's filing was based on prospective costs, not historical costs. Pursuant to the GSF Order in CC Docket 92-222, released May 19, 1993, ATU revised its cost study and access tariff filing to reallocate General Support Facility ("GSF") costs. This tariff revision was filed June 17, 1993, to be effective July 1, 1993. On June 23, 1993, the Commission suspended all tariffs filed reallocating GSF costs pursuant to the GSF Order and imposed an accounting order. On July 27, 1993, ATU filed its direct case explaining its reallocation of GSF costs. Annexed as Attachment A are copies of ATU's revised costs and rates as filed on June 17, 1993. The reallocation of GSF costs moved \$2.3 million to carrier common line from switched and special access. ATU did not double recover for GSF. Accordingly, there is no need for ATU to submit a corrective action plan as addressed in paragraph 50 of the Memorandum Opinion and Order.

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Please address any questions or correspondence in connection with this response to:

Mr. Bill Wilks
ATU Telecommunications
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Anchorage, AK 99503

with a copy to:

Paul J. Berman
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044-7566

Respectfully submitted,



Melpine Evans
Chief Financial Officer

cc Chief, Tariff Review Branch (Public Reference Copy)
International Transcription Service
Mr. James Litchford, Tariff Review Branch, F.C.C.
Paul J. Berman, Covington & Burling

**ANCHORAGE TELEPHONE UTILITY
INTERSTATE ACCESS TARIFF
REVISED 1993 ACCESS TARIFF FILING**
Pursuant to CC Docket 92-222, Released May 19, 1993

SCHEDULE DJ-1
Part 69 Impact of GSF Allocation Change From April 2nd Filing

	CARRIER COMMON LINE	SWITCHED ACCESS	SPECIAL ACCESS	TOTAL
APRIL 2, 1993	\$7,917,484	\$10,184,238	\$4,865,272	\$22,966,994
JUNE 17, 1993	<u>\$10,184,986</u>	<u>\$8,704,143</u>	<u>\$4,077,865</u>	<u>\$22,966,994</u>
INCREASE/(DECREASE)	<u>\$2,267,502</u>	<u>(\$1,480,095)</u>	<u>(\$787,407)</u>	<u>\$0</u>
% INCREASE/DECREASE	28.60%	-14.50%	-16.10%	

ANCHORAGE TELEPHONE UTILITY
1993 REVISED INTERSTATE ACCESS TARIFF FILING PURSUANT TO CC DOCKET 92-222
SECTION 3 - RATE COMPARISON SCHEDULE

Rate Element	Annual Demand	ATU's Filed Rate 02-Apr-93	ATU's Filed Rate 21-May-93	ATU's Proposed 01-Jul-93	Rate Reduction	Percent Change In Rate
<u>Switched Access Nonrecurring Charges</u>						
- Installation NRCs Per line or trunk Feature Groups A, B, C, D, & DA	100	332.00		\$332.00	0.00	0.00%
- Service Orders	10	87.92		\$87.92	0.00	0.00%
- PIC Change	4,800	5.00		\$5.00	0.00	0.00%
- Interim NXX Translation NRC Per Order	0	87.92		\$87.92	0.00	0.00%
- Local Transport Premium Access						
Local Transport Termination	489,982,393	0.0012		\$0.0011	\$0.0001	-6.25%
Local Transport Facility	1,844,774,815	0.000431		\$0.000252	\$0.0002	-41.53%
- Trunk To SS7 Per 24	88	444.00		\$444.00	0.00	0.00%
- International Blocking	0	9.77		\$9.77	0.00	0.00%
- Network Blocking Charge	0	0.0354		\$0.0354	0.00	0.00%
A) Common Channel Signaling Network Connection						
(1) Signaling Network Access Link						
- Signaling Mileage Facility	240	6.58		\$5.11	\$1.47	-22.34
- Signaling Mileage Termination	240	53.81		\$51.96	\$1.85	-3.44
- Signaling Entrance Facility	60	131.03		\$105.68	\$25.35	-19.35
- Signaling Entrance Facility, NRC Installation	5	289.46		\$289.46	0.00	0.00%
(2) STP Port	60	665.00		\$665.00	0.00	0.00%
B) 800 Data Base Access Service Queries						
- Per Query						
Basic	20,600,825	0.0236	0.0227	\$0.0227	0.00	0.00%
Vertical Feature	1,015,990	0.0236	0.0227	\$0.0227	0.00	0.00%
<u>End Office</u>						
A) Local Switching						
LS1 Premium	67,945,678	0.0135		\$0.0113	\$0.0022	-16.30%
LS2 Premium	422,036,715	0.0135		\$0.0113	\$0.0022	-16.30%
B) Information Surcharge						
Per 100 Access Minutes Premium	4,899,824	0.0293		\$0.0293	\$0.0000	0.00%

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<u>Directory Assistance</u>		Per MSG				
A) Directory Assistance Service/Call	1,825,446	0.7716	0.8893	\$0.8626	\$0.0267	-2.98%
B) Directory Service Transport/Call	1,825,446	0.0026	0.0026	\$0.0018	\$0.0008	-29.38%
C) Directory Assistance Credit Premium FGA, FGC & FGD	0	0.0132	0.0132	\$0.0107	\$0.0025	-18.94%
Telecommunications Service Priority	0	54.63		\$54.63	0	0.00%
Unauthorized PIC Change (Bus/Res)	0	35.65		\$35.65	0	0.00%
Unauthorized PIC Change (Pay)	0	57.57		\$57.57	0	0.00%

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<u>Surcharge for Special Access Service</u>	1,788	25.00		\$25.00	0	0.00%
<u>Special Access Voice Grade</u>						
A) Channel Termination						
Two-Wire	2,220	34.16		\$26.90	\$7.26	-21.25%
Four-Wire	15,968	94.00		\$75.08	\$18.92	-20.13%
Channel Termination, NRC Installation						
Two-Wire	39	193.31		\$193.31	\$0.00	0.00%
Four-Wire	321	193.31		\$193.31	\$0.00	0.00%
B) Channel Mileage						
(1) Channel Mileage Facility	24,952	3.29		\$2.56	\$0.73	-22.19%
(2) Channel Mileage Termination	10,876	26.94		\$26.00	\$0.94	-3.49%
C) Optional Features and Functions						
Bridging per Port						
Two-Wire	250	4.85		\$3.90	\$0.95	-19.59%
Four-Wire	1,958	8.40		\$6.75	\$1.65	-19.64%
Conditioning C-type	1,116	16.80		\$13.50	\$3.30	-19.64%
Data Capability	1,440	16.80		\$13.50	\$3.30	-19.64%
Improved Return Loss						
Two-Wire	0	16.80		\$13.50	\$3.30	-19.64%
Four-Wire	0	16.80		\$13.50	\$3.30	-19.64%
Signaling Capabiltiy	3,319	18.35		\$14.75	\$3.60	-19.62%
<u>Special Access Program Audio</u>						
A) Channel Termination Per Month						
200 - 3500 Hz	24	26.82		\$20.84	\$5.98	-22.30%
100 - 5000 Hz	0	110.00		\$88.31	\$21.69	-19.72%
50 - 8000 Hz	83	110.00		\$88.31	\$21.69	-19.72%
50 - 15000 Hz	153	110.00		\$88.31	\$21.69	-19.72%
Channel Termination Per Day						
200 - 3500 Hz	0	ICB		ICB	ICB	
100 - 5000 Hz	0	ICB		ICB	ICB	
50 - 8000 Hz	0	ICB		ICB	ICB	
50 - 15000 Hz	0	ICB		ICB	ICB	

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Channel Termination, NRC Installation						
200 - 3500 Hz	0	382.71		\$382.71	0	0.00%
100 - 5000 Hz	0	382.71		\$382.71	0	0.00%
50 - 8000 Hz	1	382.71		\$382.71	0	0.00%
50 - 15000 Hz	0	382.71		\$382.71	0	0.00%
B) Channel Mileage						
(1) Channel Mileage Facility, Per Month						
200 - 3500 Hz	0	3.29		\$2.56	\$0.73	-22.19%
100 - 5000 Hz	0	6.58		\$5.11	\$1.47	-22.34%
50 - 8000 Hz	48	9.87		\$7.66	\$2.21	-22.39%
50 - 15000 Hz	48	13.16		\$10.22	\$2.94	-22.34%
Channel Mileage Facility, Per Day						
200 - 3500 Hz	0	ICB		ICB	ICB	
100 - 5000 Hz	0	ICB		ICB	ICB	
50 - 8000 Hz	0	ICB		ICB	ICB	
50 - 15000 Hz	0	ICB		ICB	ICB	
(2) Channel Mileage Termination, Per Month						
200 - 3500 Hz	0	26.94		\$26.00	\$0.94	-3.49%
100 - 5000 Hz	0	53.81		\$51.96	\$1.85	-3.44%
50 - 8000 Hz	24	80.75		\$77.97	\$2.78	-3.44%
50 - 15000 Hz	48	107.69		\$103.98	\$3.71	-3.45%
Channel Mileage Termination, Per Day						
200 - 3500 Hz	0	ICB		ICB	ICB	
100 - 5000 Hz	0	ICB		ICB	ICB	
50 - 8000 Hz	0	ICB		ICB	ICB	
50 - 15000 Hz	0	ICB		ICB	ICB	
<u>Special Access Video</u>						
A) Channel Termination						
DS-1 Simplex	0	4,008.05		\$3,311.58	\$696.47	-17.38%
DS-1 Duplex	0	5,843.83		\$4,829.59	\$1,014.24	-17.36%
Channel Termination, NRC Installation						
DS-1 Simplex	0	791.91		\$791.91	0	0.00%
DS-1 Duplex	0	791.91		\$791.91	0	0.00%
B) Channel Mileage						
(1) Channel Mileage Facility						
DS-1 Simplex	0	67.10		\$52.10	\$15.00	-22.35%
DS-1 Duplex	0	67.10		\$52.10	\$15.00	-22.35%

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(2) Channel Mileage Termination						
DS-1 Simplex	0	225.29		\$217.54	\$7.75	-3.44%
DS-1 Duplex	0	225.29		\$217.54	\$7.75	-3.44%
<u>Special Access Digital Data</u>		Monthly				
A) Channel Termination						
2.4 kbps	0	131.03		\$105.68	\$25.35	-19.35%
4.8 kbps	0	131.03		\$105.68	\$25.35	-19.35%
9.6 kbps	1,410	131.03		\$105.68	\$25.35	-19.35%
56.0 kbps	3,186	131.03		\$105.68	\$25.35	-19.35%
Channel Termination, NRC Installation						
2.4 kbps	0	289.46		\$289.46	0	0.00%
4.8 kbps	0	289.46		\$289.46	0	0.00%
9.6 kbps	59	289.46		\$289.46	0	0.00%
56.0 kbps	124	289.46		\$289.46	0	0.00%
B) Channel Mileage						
(1) Channel Mileage Facility						
2.4 kbps	0	3.30		\$2.56	\$0.74	-22.42%
4.8 kbps	0	3.30		\$2.56	\$0.74	-22.42%
9.6 kbps	1,622	3.30		\$2.56	\$0.74	-22.42%
56.0 kbps	2,739	6.58		\$5.11	\$1.47	-22.34%
(2) Channel Mileage Termination						
2.4 kbps	0	26.94		\$26.01	\$0.93	-3.45%
4.8 kbps	0	26.94		\$26.01	\$0.93	-3.45%
9.6 kbps	952	26.94		\$26.01	\$0.93	-3.45%
56.0 kbps	1,704	53.81		\$51.96	\$1.85	-3.44%
C) Optional Features and Functions						
(1) Bridging	288	5.10		\$4.10	\$1.00	-19.61%
<u>Special Access High Capacity</u>						
A) Channel Termination						
1.544 mbps	2,076	300.78		\$246.04	\$54.74	-18.20%
44.736 mbps (Capacity of 3 DS-3 Channels, 1 Installed)	48	6,531.30		\$5,326.21	\$1,205.09	-18.45%
Channel Termination, NRC Installation						
1.544 mbps	67	\$467.90		\$467.90	0	0.00%
44.736 mbps	0	\$980.80		\$980.80	0	0.00%

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B) Channel Mileage						
(1) Channel Mileage Facility						
1.544 mbps	2,657	\$67.10		\$52.10	\$15.00	-22.35%
44.736 mbps	144	\$644.19		\$500.13	\$144.06	-22.36%
(2) Channel Mileage Termination						
1.544 mbps	984	225.29		\$217.53	\$7.76	-3.44%
44.736 mbps	72	1,013.82		\$978.90	\$34.92	-3.44%
D) Optional Features and Functions						
(1) Multiplexing						
DS3 to DS1	24	961.35		\$772.50	\$188.85	-19.64%
DS1 to Voice	89	317.55		\$255.15	\$62.40	-19.65%
DS1 to DS0	196	784.70		\$630.55	\$154.15	-19.64%
DS0 to Subrates						
2.4 kbps	0	480.35		\$386.00	\$94.35	-19.64%
4.8 kbps	0	240.15		\$193.00	\$47.15	-19.63%
9.6 kbps	0	120.10		\$96.50	\$23.60	-19.65%
(2) Automatic Loop Transfer	0	76.50		\$61.50	\$15.00	-19.61%
<u>Service Order NRCs Per Order</u>						
A) Access Order Charge	448	87.92		\$87.92	0	0.00%
B) Service Date Change	50	40.67		\$40.67	0	0.00%
C) Design Change	1	40.67		\$40.67	0	0.00%
D) Miscellaneous Service	0	40.67		\$40.67	0	0.00%
<u>Additional Engineering, Per 1/2 Hour</u>						
A) Basic Time	823	46.28		\$46.28	0	0.00%
B) Overtime	12	69.41		\$69.41	0	0.00%
C) Premium Time	16	92.55		\$92.55	0	0.00%
<u>Additional Labor, Per 1/2 Hour</u>						
A) Installation & Repair						
Basic Time	0	40.85		\$40.85	0	0.00%
Overtime	63	61.28		\$61.28	0	0.00%
Premium	64	81.70		\$81.70	0	0.00%

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B) Stand by						
Basic	4	43.57		\$43.57	0	0.00%
Overtime	0	65.35		\$65.35	0	0.00%
Premium	0	87.13		\$87.13	0	0.00%
C) Testing and Maintenance						
- I/R Technician						
Basic	129	40.85		\$40.85	0	0.00%
Overtime	14	61.28		\$61.28	0	0.00%
Premium	7	81.70		\$81.70	0	0.00%
- CO Technician						
Basic	146	40.39		\$40.39	0	0.00%
Overtime	0	60.59		\$60.59	0	0.00%
Premium	14	80.79		\$80.79	0	0.00%